



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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Mary A. Gade, Director

217/782-9875

Refer to: L1630200005 -- St. Clair County
Sauget Area 1 Sites - Sauget
Superfund/Technical Reports

October 22, 1997

Mr. D. Michael Light
Manager, Remedial Projects
Solutia Inc.
10300 Olive Boulevard
St. Louis, Missouri 63166-6760

Dear Mr. Light:

Illinois EPA has had the opportunity to review your proposal that was presented to us at our September 2, 1997 meeting in Springfield. Based on Illinois EPA's review of your proposal, Illinois EPA would agree with your conclusion that it is difficult to provide a short term solution to the flooding problems that exist at Dead Creek. We do have concerns, however, that your proposal which essentially entails the creation of a landfill within the creek confines may not be viewed favorably as a remedy that adequately satisfy all "Nine Criteria" that are used in evaluating remedies under Superfund. While this remedy would likely satisfy some of the criteria it may not satisfy criteria such as long-term effectiveness, reduction of toxicity mobility or volume through treatment and State/community acceptance.

As we had stated at our meeting in early September, this remedy appears to be predicated on the assumption that PCB contamination in Dead Creek is widespread, which may or may not be the case. The proposed remedy may be appropriate in areas of the creek where contaminant levels are very high (such as in Creek Segment B) with the rationale that the cost of having to incinerate or landfill large quantities of sediment would be orders of magnitude greater than landfilling on site. On the contrary, if it were to be determined through an RI/FS that only portions of the creek were highly contaminated, a "hot spot" removal action could be a more appropriate alternative if followed by a design to create a concrete-lined "open channel" in Dead Creek to address flooding problems. This channel would likely have a capacity to address higher volumes of stormwater without placing restrictions on adjacent property owners who want to tie in to the stormwater system.

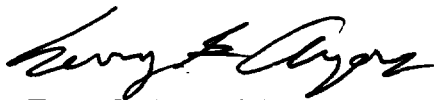
We are obviously in a situation now in which it is impossible to make volumetric determinations of the waste types that are present at the creek. After further review of this situation, it may be

more prudent to negotiate the terms of an RI/FS that would address the contamination problems in and around residential areas of Dead Creek as well as the other sites of Sauget Area 1. I do want to stress that anything that has been stated in this letter should not be taken as an endorsement of Solutia's proposed remedy or a statement of what type of remedy the State believes is necessary to address both sediment contamination and the flooding problems. Illinois EPA appreciates Solutia's work in addressing the problems of the community in Cahokia, but we believe that this stage, an RI/FS is more appropriate. I certainly believe that this can be completed in a relatively short timeframe considering the nature of the contaminants and a rather limited number of remedial options both Solutia and Illinois EPA have to address them.

With respect to an Area 1 RI/FS Consent Decree and Statement of Work, I expect to send you a first draft of both documents within about three weeks. Perhaps we could discuss Solutia's comments on these documents before Thanksgiving.

If you have questions or concerns, please call.

Yours Truly,



Terry G. Ayers, Manager
National Priorities Unit
Division of Remediation Management
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cc: Paul Takacs
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Division File